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FILED
DISTRICT COURT OF GUAM

OCT 17 2007 AF

JEANNE G. QUINATA
Clerk of Court

5 Attorneys for Petitioners

DISTRICT COURT OF GUAM

6 TERRITORY OF GUAM

7 JULIE BABAUTA SANTOS, et al., CIVIL CASE NO. 04-00006

8 Petitioners,

9
10 **PETITIONER'S JOINDER IN**
11 **PETITIONER TORRES' RESPONSE**
12 **TO THE COURT'S ORDER OF**
13 **OCTOBER 16, 2007 Re: THE**
14 **PROTECTION OF DETAILED BILLING**
15 **RECORDS**

16 FELIX A. CAMACHO, etc., et al.,

17 Respondents.

18 The Petitioner, individually and on behalf of all those similarly situated (hereinafter "EIC
19 Class"), through her attorneys of record Phillips and Bordallo, P.C., by Michael F. Phillips,
20 herewith joins in Petitioner Torres' Response to the Court's Order of October 16, 2007,
21 regarding the applicability of redaction, *in camera* review, or sealing of the detailed billings
22 records is appropriate under the circumstances.

23 The court has authority to require submission of relevant documents for *in camera*
24 inspection, or to make other appropriate orders to preserve the privacy of confidential material.
25 See Rules 26(c)(5), (7) and (8), Fed.R.Civ.P.; 8 C. Wright & A. See also, In re First Peoples
26 Bank Shareholders Litigation, 121 F.R.D. 219, 230 (D.N.J. 1988) (The broad discretion of the
27 court in handling confidential information was summarized by Justice Holmes: It will be
28 understood that if, in the opinion of the trial judge, it is or should become necessary to reveal

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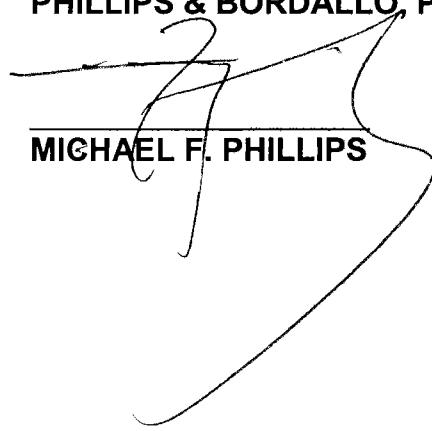
1 the secrets to others, it will rest in the judge's discretion to determine whether, to whom, and
2 under what precautions, the revelation should be made.)
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4 The Ninth Circuit has long held that detailed billing statements are protected under the
5 attorney-client privilege. In re Grand Jury Subpoena Issued To Horn, 1992 U.S. App. LEXIS
6 30917 (9th Cir. 1992). The Court in In re Grand Jury, held that the demand for letters of
7 consultation and retainer agreements describing the intended scope of the attorney-client
8 relationship, billing records describing the services performed for his clients and the time spent
9 on those services, and any other attorney-client correspondence relating to the performance of
10 legal services and the rates therefore constitute an unjustified intrusion into the attorney-client
11 relationship." See also, In re Grand Jury Witness (Salas), 695 F.2d 359, 362 (9th Cir. 1982).

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13 Based on the foregoing, the court should take such steps it deems necessary so as to
14 preserve the privacy and confidentiality of the requested materials.

15 Respectfully submitted this 17th day of October, 2007.
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18 By:
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20 PHILLIPS & BORDALLO, P.C.
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23 MICHAEL F. PHILLIPS
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